



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
JOHN F. KENNEDY FEDERAL BUILDING  
ONE CONGRESS STREET  
BOSTON, MASSACHUSETTS 02203-2211

July 20, 1995

Mr. Robert Krivinskas  
U.S. Department of the Navy  
Northern Division - NAVFAC  
10 Industrial Highway  
Code 1823 - Mail Stop 82  
Lester, PA 19113-2090

Re: Comments on the Draft Addendum to the Draft Focused Feasibility Study Source Control (FFS) Site 09- Allen Harbor Landfill for the former Naval Construction Battalion Center, RI

Dear Mr. Krivinskas:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA), the following are the Environmental Protection Agency's (EPA) preliminary comments on the above referenced document:

1. The ARAR tables have been revised in response to our comments dated April 4, 1995.
2. The BCT should schedule a scoping meeting to plan the coastal wetland creation, if the Navy is planning to incorporate Alternative 5 in the final remedy for the landfill as was discussed during a BCT meeting June 8, 1995.
3. The EPA has some remaining concerns on the constructability/implementability of Alternatives 4 & 5.

During the review of the draft Detailed Analysis of Alternatives dated March 1994, the EPA had identified some remaining issues that needed to be resolved before final concurrence could be given. The Navy responded by performing a Phase III RI to resolve the data gaps on the Management of Migration Operable Unit. The Navy then submitted a Focused Feasibility Study for the Source Control Operable Unit in March of 1995. In response to comments on the FFS the Navy produced the Draft Addendum to the FFS. The Navy has since stated (BCT Meeting of July 14, 1995) that they are no longer pursuing a Source Control ROD for Site 9 and are now pursuing a whole site remedy and will provide a draft Whole-Site Feasibility Study (FS) by December 13, 1995.

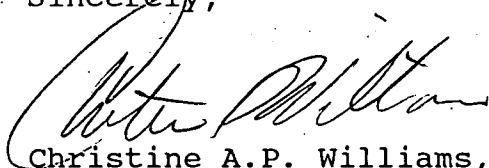
We, therefore, reserve any additional comments on this Addendum pending the review of the Whole-Site FS.



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If you have any questions concerning this letter, please contact me at (617) 573-5736.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Christine Williams', written in dark ink.

Christine A.P. Williams, RPM  
Federal Facilities Superfund Section

CC: Judy Graham, RIDEM  
Lou Fayan, NCBC  
Tim Prior, USF&WL  
Ken Finkelstein, NOAA  
Bill Brandon, EPA  
Yoon-Jean Choi, EPA  
Bob DiBiccaro, EPA  
Jayne Michaud, EPA  
Scot Gnewuch, ADL